

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)
)
Amendment of Section 73.202(b))
Table of FM Allotments)
Shingletown, California)

RE: MM Docket # 95-51

RM-8591

To: The Chief, Mass Media Bureau

DOCKET FILE COPY ORIGINAL

REPLY COMMENTS

Comes now, Mark C. Allen to respectfully reply to different counterproposals to my petition for rulemaking at Shingletown, California for the allocation of channel 232'A'.

I was served a notice that a person had or was filing a counterproposal against my petition for the allocation of channel 232'C-2' at Hayfork, in Trinity County, California. I was surprised to say the least, when I read that this so-called counterproposal claimed that the Commissions' own data bank was in error and that his counterproposal was not short spaced to a pending rulemaking at Garberville-Hydesville, California. This claim is ludicrous and totally without merit. Commission Policy, Rules and Procedure require that all requests to amend the FM or Television Table of Allotments conform and utilize the data on file in the Commissions' Official allocation lists and databanks. Thus, any counterproposal that does not meet those requirements must and should be rejected, as should the counterproposal at Hayfork, California. I therefore kindly request that the Commission return the Hayfork counterproposal for failure to meet technical and procedural requirements.

The counterproposal at Hayfork only seeks to delay a new allocation at Shingletown. So that I may go forward with my request for allocation of a class 'A' channel to Shingletown, I would like to offer the Commission channel 241'A' instead of channel 232'A'. I have included a new channel study for channel 241'A' at Shingletown, with a slight site restriction to the west of the city of license. This site restriction complies with all of the Commissions' requirements for allocation under 73.207 and 73.208. The proposed site restriction would still enable an applicant to provide the required 70 dBu contour over the city of license. This channel is not a counterproposal since it is of the same class and for the same city as the original petition for rulemaking. This channel will allow the Commission to allocate a new channel as soon as possible.

I do not feel that the possible allocation of a second channel to Dunsmuir, should be precluded in any way. If the Commission were to allocate channel 241'A' at Shingletown, then channel 231'C-3' could be allocated. If the Commission does not wish to assign channel 241'A' at Shingletown, then the allotments can still be granted, provided that the Commission allot either channel with a slight channel restriction away from each other. I have included a new channel study for channel 231'C-3' at Dunsmuir from an existing class 'C-3' site. This site would provide a 70 dBu over Dunsmuir and would provide the needed site restriction to enable the Commission to allocate both channels. There would be no need for another site restriction at Shingletown.

If the Commission had a problem with allocating channel 231'C-3' at Dunsmuir, channel 240'C-3' would work as well at the proposed site restriction. The Commission should also be aware that this site is licensed and known to the Commission and meets the requirements of Section 73.208. This would allow two new services in Northern California.

In conclusion, I request that the Commission dismiss the counterproposal at Hayfork, California and allot channel 241'A', with a site restriction to Shingletown and that the Commission allot either channel 231'C-3' or 240'C-3', with site restriction to the existing KZRO FM tower site. All statements of fact are true and correct when made, under penalty of perjury. Dated June 30, 1995.

Yours Respectfully,

Mark C. Allen
3745 McHale Way
Redding, California 96001



WHEN THE CHANNEL 241 A (96.1 MHZ) FOR SHINGLETOWN
CALIFORNIA IS APPROVED I MARK C. ALLEN WILL FILE
FOR A CONSTRUCTION PERMIT.

MARK C. ALLEN

JULY, 1 1995

A handwritten signature in cursive script, appearing to read "Mark C. Allen", written in dark ink.

COMMENTS OF MARK C. ALLEN

Co-channel , Adjacent Channel , and I.F. Spacing for FM Channel
241A at Shingletown , California.

96.1 FM

Reference Coordinates : 40 - 29 - 48 , 121 - 59 - 23

CALL SIGN CITY OF LICENSE	CHANNEL FREQ.(MHZ)	REQUIRED DISTANCE(km)	ACTUAL DISTANCE(km)
ALLOCA RENO	238C 95.5	95	238.9
KALF RED BLUFF	239B 95.7	69	86.5
ALLOCA QUINCY	240A 95.9	72	110.3
KYMX SACRAMENTO	241B 96.1	178	210.0
ALLOCA SUSANVILLE	242C2 96.3	106	106.2
Site Restriction 4.9 Miles West ; Filing Window 12/11 - 01/10/91 **Closed **			
KKLC SUSANVILLE	242C3 96.3	89	118.9
KFMI EUREKA	242C 96.3	165	169.7
ALLOCA TULELAKE	243C 96.5	95	180.2
KZAP PARADISE	244B1 96.7	48	63.87
KDIG ORLAND	294B 106.7	15	86.68
KKRB KLAMATH FALLS	295C1 106.9	22	192.4

FM CHANNEL STUDY

DUNSMUIR, SISKIYOU COUNTY, CA.
CHANNEL: 231 C-3 94.1 MHZ

LATITUDE: 41-17-20 N
LONGITUDE: 122-14-25 W

CALL/CITY	CHAN./CLASS	PWR/HAAT	LAT./LONG.	DIST. APART	DIST. REQUIRED
KQIK-FM LIC	228 A	.28	42-12-18	102.01 KM	42 KM
LAKEVIEW, OR.	93.5	305	122-19-39	60.01 KM	CLEAR
ORDERED TO CHANNEL 228 C-3, NO APPLICATION ON FILE					
KQIK-FM ALLOC	228 C-3		42-12-18	102.01 KM	43 KM
LAKEVIEW, OR.	93.5		122-19-39	59.01 KM	CLEAR
KTMT LIC	229 C	31	42-04-55	96.76 KM	96 KM
MEDFORD, OR.	93.7	994	122-43-17	.79 KM	CLOSE
KPMF LIC	230 B-1	2	39-56-46	155.44 KM	114 KM
CHICO, CA.	93.9	344	121-43-17	41.44 KM	CLEAR
KAHY CP	231 A	2.22	43-01-05	250.03 KM	142 KM
MYRTLE POINT, OR.	94.1	114	124-10-37	108.03 KM	CLEAR
PRM	232 A		40-29-33	93.29 KM	89 KM
SHINGLETOWN, CA.	94.3		121-53-17	4.29 KM	CLOSE
KYAX LIC	233 C-1	100	41-33-50	155.58 KM	76 KM
ALTURAS, CA.	94.5	-58	120-24-55	79.58 KM	CLEAR
ORDERED TO CHANNEL 267 C, NO APPLICATION ON FILE					
KEWB LIC	234 C-2	4.2	40-39-06	74.73 KM	56 KM
ANDERSON, CA.	94.7	477	122-31-32	18.73 KM	CLEAR
PRM DOC 94-86	284 C-1		42-12-56	109.27 KM	24 KM
KLAMATH FALLS, OR.	104.7		121-47-56	85.27 KM	CLEAR
CPRM DOC 94-86	284 C-1		42-12-00	109.79 KM	24 KM
ALTAMONT, OR.	104.7		121-43-42	85.79 KM	CLEAR
KBEY LIC	284 C	50	40-07-15	178.47 KM	31 KM
GARBerville, CA.	104.7	808	123-41-27	147.47 KM	CLEAR
KYIX LIC	285 A	.28	39-39-04	193.47 KM	12 KM
SOUTH OROVILLE, CA.	104.9	472	121-27-43	181.47 KM	CLEAR

DISTANCE AND DIRECTION

DUNSMUIR (REF. CO-ORDs.): 41-12-30 X 122-16-18

PROPOSED SITE RESTRICTION: 41-17-20 X 122-14-25

PROPOSED SITE IS LICENSED SITE OF RADIO STATION KZRO-FM, DUNSMUIR, CA.
SITE HAAT : + 100 METERS HAAT

DISTANCE APART: 9.33 KM (5.79 MILES) (WITHIN 70 dBu LIMIT)
DIRECTION FROM CITY: 16.32 DEGREES